

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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April 9, 2003

BY E-MAIL AND
FIRST CLASS U.S. MAIL

Kerry J. Kuhlman
President and Chief Operating Officer
Western Massachusetts Electric Company
174 Brush Hill Avenue
West Springfield, MA 01090-2010

Re: Western Massachusetts Electric Company, D.T.E. 03-23

Dear Mr. Kuhlman:

Enclosed is the First Set of Information Requests by the Department of Telecommunications and Energy to Western Massachusetts Electric Company regarding the captioned matter. Please submit copies of the Company's responses to the information requests to the Department by 5:00 p.m., April 23, 2003.

Should you have any questions please contact me at (617) 305-3762. Thank you for your prompt attention to this matter.

Sincerely,

Jody Stiefel
Hearing Officer

Enc.
cc: Mary Cottrell, Secretary

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. 03-23

**FIRST SET OF INFORMATION REQUESTS TO
WESTERN MASSACHUSETTS ELECTRIC COMPANY**

The Department of Telecommunications and Energy ("Department") submits to Western Massachusetts Electric Company ("WMECo" or "Company") the following Information Requests.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request refers to the Company's 2002 SQ report filed on March 3, 2003 ("Filing").
2. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer. Provide electronic versions of all calculation and worksheets together with your responses. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed **but no later than April 23, 2003**.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or their witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "**historical data**" refers to data for the years **1992 through 2001**.
5. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
6. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

7. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
8. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department; also submit four (4) copies of the responses to Jody M. Stiefel, Hearing Officer, and (2) copies to Glenn Shippee, Rates and Revenue Requirements Division.

Requests

- DTE 1-1 Referring to the Company's cover letter dated March 3, 2003, please provide a copy of the Company's SQ plan approved by the Department on December 17, 2001, with any adjustments, revisions, or corrections that might have been made since then.
- DTE 1-2 Referring to the Company's Filing at § I-1, please provide all the documents, reports, memoranda, worksheets, etc., used to calculate the performance results for the year 2002, and explain the method used to derive the results from the source data.
- DTE 1-3 Referring to the Company's Filing at § II-24, please provide the source and calculations supporting the statement that WMECo's 2002 Distribution Revenues are \$105,957,000.
- DTE 1-4 Referring to the Company's Filing at § II-24, please provide the source and calculations supporting the statement that WMECo's 2002 Transmission Revenues are \$13,976,000.
- DTE 1-5 Referring to the Company's Filing at § II-24, please explain the source and calculations related to the amount of the Customer Service Guarantees and why they are deducted from the total Transmission and Distribution Revenues to produce Net Revenues.
- DTE 1-6 Please refer to the Company's Filing at § II-24, wherein the SAIDI penalty multiplier is identified as 0.961. Explain the method for the penalty/offset multiplier determination and provide the worksheets with the actual SAIDI multiplier calculation.
- DTE 1-7 A review of the electronic files provided by the Company on March 14, 2002 in response to the Hearing Officer's request, in particular, file "DTE 03-23 WMECo Section 2.doc," at 24, indicates that the Company apparently calculated Penalties/Offsets manually after rounding the multipliers, which might have introduced some inaccuracies. Please reformat the data provided at § 2-24 into

the Excel file and provide a revised Paragraph V "Calculation of Revenue Penalties and Penalty Offsets." The Excel worksheet should include calculation of the historical averages, standard deviations, multipliers, revenue subject to penalty, revenue exposure for each performance measure, and corresponding penalties/offsets. The revised worksheet should be also provided electronically.

- DTE 1-8 Referring to the Company's cover letter dated March 3, 2003, at 2, please explain whether and, if so, how the Institute of Electrical and Electronics Engineers ('IEEE') 1366 Guidelines, if adopted by the Department, would improve the Company's SQ program. In particular, please explain the principles of identification of the events to be excluded from the penalty calculation under the IEEE 1366 Guidelines.
- DTE 1-9 Referring to the Company's Filing at § III-1, entitled "WMECo Listing of Major Capital Investments 2002", please break down the \$1,875,000 of Total dollars (000) Budgeted for Distribution Lines - Overhead and Underground for individual items 1, 2, 3, and 4.
- DTE 1-10 Referring to the Company's Filing at § III-1, entitled "WMECo Listing of Major Capital Investments 2002", please provide detailed information about the project(s) itemized as "Replace Direct Buried Cable" and explain why the actual expenditures exceeded the budget by \$129,000.
- DTE 1-11 A review of the data provided in the Company's Filing at § III-1, entitled "WMECo Listing of Major Capital Investments 2002" suggests that, in general, actual expenditures for the distribution system in 2002 exceed the budgeted amounts, and all the way around for the transmission system upgrades. Please explain this phenomenon.
- DTE 1-12 Referring to the Company's Filing at § III-1, entitled "WMECo Listing of Major Capital Investments 2002", please provide detailed information about the project itemized as "Enhance Direct Buried Loop Systems" and explain why the actual expenditures exceeded the budget by \$343,000.
- DTE 1-13 Referring to the Company's Filing at § III-1, entitled "WMECo Listing of Major Capital Investments 2002", item "E. Springfield S/S - Replace 2 115KV Breakers" was not budgeted. Please explain why not.
- DTE 1-14 Refer to the Company's Filing at § III-1, entitled "WMECo Listing of Major Capital Investments 2002", item "Montague S/S - Replace Backup Relays" was budgeted at \$153,000 and actual expenditures were \$4,000. Please explain whether the project was, in fact, completed and, if so, why the Company allocated substantially more money in the budget than was actually needed.

- DTE 1-15 A review of the Company's Filing at §§ III- 2 through III-6, entitled "WMECo Listing of Major Capital Investments 1997-2001", shows that WMECo never spent less than \$1 million annually on the conversion of its 4KV underground ("UG") system in Springfield alone, while, according to page 1 (2002 data), WMECo's 2002 actual expenditures to convert 4KV Underground Systems both in Springfield and Pittsfield were below \$0.7 million. Please explain why the Company reduced its expenditures on the 4KV UG conversion in 2002 compared to the previous five years.
- DTE 1-16 Referring to the Company's Filing at §§ III-1, III-2, "WMECo Poor Performing Circuits" SAIDI and SAIFI, circuit 38A1 in Ashfield, the Company conducted whole circuit trim in 2001, and, nevertheless, in 2002, the circuit tripped on two occasions due to the trees. Please provide any manuals or guidelines adopted by the Company for scheduling and conducting tree trimming, explain whether and how the Company followed the guidelines, and explain why those preventive maintenance measures failed to prevent the outages in 2002.
- DTE 1-17 Referring to the Company's Filing at §§ III-1, III-2, "WMECo Poor Performing Circuits" SAIDI and SAIFI, circuit 19J2 in Blandford, the Company conducted whole circuit trim in 2001. In 2002, the circuit failures were "lightning, tree, and equipment related," and the Company claims that "no further action required with trees." Please explain why no further action with trees is required on 19J2, if trees contributed to the 2002 outages. Also, explain why whole circuit trimming in 2001 failed to prevent outage(s) in 2002 related to tree(s). Provide a list of the outages on 19J2 in 2002, the dates, duration, root cause and each outage contribution to the circuit 2002 SAIDI and SAIFI.
- DTE 1-18 Refer to the Company's Filing at §§ III-1, III-2, "WMECo Poor Performing Circuits" SAIFI. Please explain why the town of circuit 19J2A location is identified as "Russell," not "Blandford."
- DTE 1-19 Refer to the Company's filing at §§ III-1 and III-2, "WMECo Poor Performing Circuits" SAIDI and SAIFI, circuit 19J2A. The Company states that the causes of the circuit poor performance in 2002 and action taken/planned are identical to circuit 19J2. Please provide a list of the outages on 19J2A in 2002, the dates, duration, root cause and each outage contribution to the circuit 2002 SAIDI and SAIFI. Also, provide a map of the area depicting circuit 19J2A and its relevance to circuit 19J2.
- DTE 1-20 Refer to the Company's Filing at §§ III-1 and III-2, "WMECo Poor Performing Circuits" SAIDI and SAIFI. For circuit 18C1 in Dalton, no explanation of the circuit poor performance in 2002 is provided. Please provide a list of outages

on the circuit that occurred in 2002 with explanation of the root causes, and explain the corrective actions taken (“additional LA’s installed).

- DTE 1-21 Refer to the Company’s Filing at §§ III-1 and III-2, “WMECo Poor Performing Circuits” SAIDI. For circuit 19J3 in Blandford, please explain whether the Company did not conduct whole circuit trim on 19J3 in Blandford in 2001, concurrently with the whole circuit trim on 19J2 and 19J2A, and if not, why not? Also, provide a list of the outages on 19J3 in 2002, the dates, duration, root cause and each outage contribution to the circuit 2002 SAIDI and SAIFI. Also, provide a map of the area depicting circuit 19J3.
- DTE 1-22 Refer to the Company’s Filing at §§ III-1 and III-2, “WMECo Poor Performing Circuits” SAIFI, circuit 19J3 in Blandford. Consecutive years of poor performance of the circuit include 1997, 1998, and 1999 only. However, SAIDI page 2 shows that poor performance of the circuit continued through years of 2000, 2001, and 2002. Please provide the SAIFI result for 19J3 in 2000, 2001, and 2002, and explain whether and, if so, why the Company does not categorize the circuit as a poor performer in 2000-2002 from the SAIFI perspective.
- DTE 1-23 For each of the areas for which Company did not meet its benchmark or is not within its deadband, please detail any necessary initiatives the Company has implemented to improve its performance.
- DTE 1-24 For each of the areas for which Company did not meet its benchmark or is not within its deadband, please detail any conditions under which the Company operated that would have influenced the results the Company achieved.
- DTE 1-25 Please detail the internal audits that have been conducted to assure the accuracy of Company data. If internal audits have not been performed, please indicate the Company’s plans to perform such audits.
- DTE 1-26 Please explain how each of the following SQ measures were recorded and measured:
- (a) Telephone Answer Factor;
 - (b) Emergency Answering;
 - (c) Service Appointments Kept;
 - (d) Meter Reads;
 - (e) Bill Adjustments;
 - (f) Lost Time Accident Rate;
 - gh) Restricted Work Day Rate.

In your response, indicate if the Company faced any recording and measurement issues and how they were resolved. Provide documentation to support your answer.

DTE 1-27 Please explain why, or provide, the ten years historical data is not available for the following SQ penalty measures and reporting requirements: Staffing Levels; Accidents; and Property Damage.

DTE 1-28 Please refer to the Company's Filing at § I-1. Do the statistics for consumer division cases and billing adjustments include only residential customers? If not, please provide information for only residential customers.